

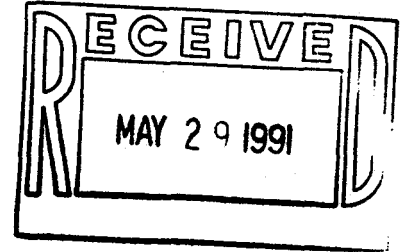
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United States Government

Department of Energy

Rocky Flats Office

memorandum



DATE: MAY 24 1991

REPLY TO
ATTN OF: WMED:SD:4113


SUBJECT: Potential Emissions from Radionuclide-Emitting Stacks at the Rocky Flats Plant (RFP)

TO: John M. Kersh, Associate General Manager
Environmental & Waste Management
EG&G Rocky Flats, Inc.

The national emission standards for hazardous air pollutants (NESHAP) for radionuclides require at 40 CFR 61.93(b)(1) and (2) that RFP use Environmental Protection Agency (EPA) Reference Methods 1 and 2 for monitoring radionuclide emissions and measuring volumetric air flow from vents and stacks. The NESHAP also includes a provision [§ 61.93(b)(4)] that exempts from the EPA Reference Methods any release point that has potential to emit radionuclides in quantities that could cause an effective dose equivalent (EDE) less than one percent of the dose standard of 10 millirem per year (mrem/yr). Potential to emit is defined as the emission rate from a release point if all pollution control equipment did not exist, but facility operations were otherwise normal [§ 61.93(b)(4)(ii)].

If any radionuclide release point at RFP has potential to cause an EDE less than 0.1 mrem/yr, then that release point is exempt from the requirements of § 61.93(b)(1) and (2), and we are not required to modify that point's monitoring system to conform to EPA Reference Methods 1 and 2. Thus, we may be able to prioritize resources allocated for compliance with the EPA Reference Methods for those release points subject to § 61.93(b)(1) and (2). Hence, I request that you determine whether any of the 53 radionuclide release points monitored at RFP have potential emissions that could cause an EDE less than 0.1 mrem/yr. Please identify each release point that meets the exemption criterion, its potential emissions (in terms of EDE) based on normal production levels, and the methodology or approach used to make the determination. I request that you submit a draft of the methodology for RFO review before your staff begins the assessment of potential emissions. Please submit the methodology to RFO by June 28, 1991, as agreed upon by our staffs.

If there are any questions, please feel free to contact me or have your staff contact Tom Lukow of my staff at 966-4561.


David P. Simonson
Assistant Manager
for Environmental Management

ADMIN RECORD

A-SW-000760